

## UNITED STATES DISTRICT COURT

for the  
District of New Mexico

**FILED**  
United States District Court  
Albuquerque, New Mexico  
Mitchell R. Elfers  
Clerk of Court

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
The person of Renado WILSON,  
date of birth: XX/XX/2004

Case No. 23 MR 1634

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):  
The person of Renado WILSON, date of birth: XX/XX/2004

located in the \_\_\_\_\_ District of \_\_\_\_\_ New Mexico \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):  
See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18 § 1153	Crimes Committed in Indian Country
Title 18 113(a)(6)	Assault Resulting in Serious Bodily Injury

The application is based on these facts:  
Please see attached affidavit.

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

Alyson Berry, FBI Special Agent  
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephonically sworn and electronically signed (specify reliable electronic means).

Date: August 23, 2023

City and state: Farmington, NM

  
Judge's signature

B. Paul Briones, U.S. Magistrate Judge  
Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE SEARCH OF:  
The person of Wallace Begay,  
DOB XX/XX/1956, SSN XXX-XX-4097  
and the person of Renado Wilson,  
DOB XX/XX/2004, SSN XXX-XX-7579

Case No. \_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Alyson Berry, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the person of Wallace BEGAY, date of birth: XX/XX/1956, SSN XXX-XX-4097 and Renado WILSON, date of birth: XX/XX/2004, SSN XXX-XX-7579, for the purpose of obtaining fingerprints and palm prints according to the standard practices and procedures employed by the FBI for fingerprint comparison. Based on the facts set forth in this affidavit, there is probable cause to believe that BEGAY and WILSON violated federal criminal statutes 18 U.S.C. § 1153, Crimes committed in Indian Country, and 18 U.S.C. § 113(a)(6) Assault Resulting in Serious Bodily Injury, and that BEGAY and WILSON's fingerprints and palm prints will provide evidence of such crimes.

2. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation ("FBI") and have been employed as such since July 2020. I am currently assigned to the Albuquerque Division of the FBI, Farmington Resident Agency. I have investigative responsibility for investigating crimes that occur in Indian Country, including violent crimes such as murder, robbery, arson, aggravated assault, and sexual assault as well as other federal crimes

that occur outside of Indian Country. I am trained and have experience in the investigation of violent crimes and crimes involving firearms and narcotics. In 2021, I attended the Advanced Indian Country Investigations course which included best practices for evidence collection and murder investigations. I have served arrest and search warrants and am authorized to investigate violations of the laws of the United States and have authority to execute arrest and search warrants issued under the authority of the United States.

3. This affidavit is based upon information reported to me by other federal, state, and local law enforcement officers during the course of their official duties. Throughout this affidavit, reference will be made to law enforcement officers. Law enforcement officers are those federal, state, and tribal law enforcement officers who have directly participated in this investigation. This affidavit is also based upon information gained from interviews with cooperating citizen witnesses, whose reliability is established separately herein.

4. This affidavit is intended to show there is probable cause for the requested search warrant and does not set forth all of my knowledge about this matter. The statements in this affidavit are based on my personal knowledge, information that I have received from other law enforcement personnel, and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to obtain the requested warrant.

#### **PROBABLE CAUSE**

5. In the early morning of January 6, 2023, a disabled man, identified with initials H.C. and year of birth 1967, hereafter referred to as JOHN DOE , was discovered badly injured in his hogan. His brother, identified with initials E.C. and year of birth 1960, hereafter referred to as

WITNESS 1, discovered him laying on the bed, badly bleeding from his head, unsure if he was alive. The hogan was badly vandalized. The lights and television were busted. Personal belongings and furniture were thrown around the room. The mattress, blankets, and pillows were soaked with blood. WITNESS 1 immediately called Emergency Medical Services.

6. WITNESS 1 woke up his injured brother and asked him what happened. JOHN DOE responded that he was hit in the head with a bat by "Nado," who is BEGAY's son. Ongoing investigation would identify "Nado" as WILSON, who is technically BEGAY's nephew, but was raised as his son. WILSON and BEGAY have a trailer next to JOHN DOE's hogan. WILSON and BEGAY visited JOHN DOE approximately twice per month, especially when they needed to borrow water or electricity.

7. JOHN DOE was taken by ambulance to San Juan Regional Medical Center and subsequently admitted to Genesis Rehabilitation Center, where he remains. Prior to the incident, JOHN DOE's physical ability to walk and talk were limited. As a result of the assault, JOHN DOE's head profusely bled after the beating. The significant loss of blood nearly resulted in his death. His ability to walk and talk was negatively impacted by the assault. He requires additional rehabilitation after this assault in order to regain any ability to walk and to be understood while speaking.

8. On January 6, 2023, the same day as the incident, Navajo Police Department (NPD), and FBI Farmington Resident Agency responded to the scene. Your Affiant observed a bloody handprint with several clear fingerprints on the exterior metal door to the hogan. The bloody handprint was located at the top left of the metal door.<sup>1</sup> After learning the victim, JOHN DOE, struggled to walk because of his disability, I concluded the handprint was likely left by the

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<sup>1</sup> Please refer to Photograph 1 on Page 9.

assailant(s). JOHN DOE was capable of walking approximately 10 steps assisted. He otherwise used a wheelchair. Investigators observed both a walker and a wheelchair at his residence. JOHN DOE is incapable of reaching high enough to have left the handprint. Even when standing, he remains in a hunched position. The door was removed from the hinges, taken to Albuquerque Evidence Response Team, and photographed professionally for fingerprint analysis.<sup>2</sup>

9. On January 6, 2023, shortly after responding to the scene of the assault, NPD knocked on the trailer door belonging to BEGAY. No one answered, but they believed WILSON was present, based on matching shoe prints from around the hogan and around the neighboring trailer. NPD located BEGAY, who signed a Consent to Search form for the trailer, unlocked the door for law enforcement, and allowed a search for WILSON. WILSON was not there. A locked door to a bedroom that belonged to BEGAY's wife was busted in. Inside the bedroom, investigators found smeared blood on the wall by an exterior window. NPD thought it was possible WILSON fled through the window when law enforcement arrived. This particular exterior window was on the far side of the trailer, not visible from JOHN DOE's hogan.

10. BEGAY told your Affiant he typically stayed in Bloomfield and that WILSON, who stayed at the trailer, was unruly and violent. BEGAY claimed he did not know where WILSON was or how to contact him. He also did not disclose he was with JOHN DOE the evening of his assault.

11. When he was well enough recovered, JOHN DOE was interviewed by your Affiant and Navajo Department of Criminal Investigations (NDCI) Criminal Investigator (CI) Custer Bryant on January 12, 2023 and February 8, 2023. Approximately two to three years ago, JOHN DOE was hit by a drunk driver while in his vehicle. He was in a coma for approximately one year,

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<sup>2</sup> Please refer to Photograph 2 – 3 for a sample of results on Page 9.

and his ongoing injuries include physical disabilities that impact his ability to walk, as well as head injuries that caused a severe speech impediment.

12. JOHN DOE disclosed that while recovering at Genesis Rehabilitation Center, JOHN DOE was visited by a female identified with initials V.B. and year of birth 1967 (hereafter referred to as WITNESS 2). WITNESS 2 is BEGAY's sister. WITNESS 2 apologized to JOHN DOE about what happened and stated there were no hard feelings between the families. Based on my training and experience, it is not unusual for the family of the assailant(s) to visit the victim and an effort to potentially discourage cooperation with law enforcement. JOHN DOE was not able to determine if this was WITNESS 2's intention or not.

13. According to JOHN DOE, on the evening of January 5, 2023, he was visited by his neighbors, BEGAY and WILSON. The three men drank whisky together. JOHN DOE does not know what happened after BEGAY and WILSON left. He did not have further memory until he was woken up by his brother the following morning. His inability to recall events was a symptom of his prior head injuries and coma.

14. On January 29, 2023, JOHN DOE's brother, identified with initials E.C. and year of birth 1958 (hereafter referred to as WITNESS 3), was checking his mail. WITNESS 3 observed BEGAY driving a truck with WILSON in the passenger seat. BEGAY stopped the vehicle near WITNESS 3. Before WITNESS 3 could even greet them, WILSON quickly said, "I didn't do it." WITNESS 3 felt WILSON was commenting on the assault and told WILSON he was not welcome on the property.

15. WILSON was in the vicinity of the hogan on the night of the assault based on statements by both JOHN DOE and BEGAY. Collection of his fingerprints and palm prints to



compare to the bloody handprint on the exterior door of JOHN DOE's hogan will provide evidence of his involvement in the assault.

16. When interviewed by law enforcement, BEGAY did not disclose that he was with JOHN DOE and WILSON the evening of the assault despite his visit to JOHN DOE that evening. His sister visited the victim to offer condolences on behalf of the family, indicating consciousness of guilt and to potentially prevent cooperation with law enforcement. BEGAY and WILSON were seen together in the same vehicle in the days following the assault despite telling law enforcement he didn't know WILSON's whereabouts or how to reach him. To definitively determine if BEGAY was involved in the assault on John Doe 1, it is important his prints are compared to those found in the bloody handprint found on the exterior door to John Doe 1's hogan.

17. I intend to send BEGAY and WILSON's fingerprints and palm prints, as well as the photographs of the bloody prints from the exterior door to FBI Laboratory for latent fingerprint testing and comparison. Latent prints from a crime scene are routinely compared to known recordings of friction ridge skin by qualified latent print examiners using a method called Analysis, Comparison, and Evaluation (ACE). Good quality, known prints are preferred to conduct thorough ACE. The known prints of an individual are typically taken by rolling their fingers in ink and then rolling the finger from nail to nail on a standard white fingerprint card. The known recordings can also be taken digitally using a scanner.

18. A swab of the blood on the exterior door of the hogan was also collected. This will be compared to DNA provided by JOHN DOE. These tests will determine whose fingerprints and palm print are on the exterior front door, as well as confirm the blood belongs to the victim, John Doe 1.

19. BEGAY, WILSON, and John Doe 1 are registered members of the Navajo Nation. This incident occurred within the exterior boundaries of the Navajo Nation Indian Reservation.

**CONCLUSION**

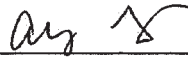
20. Based on my training, experience, and the facts as set forth in this affidavit, there is probable cause to believe that violations 18 U.S.C. § 1153, Crimes committed in Indian Country and 18 U.S.C. § 113(a)(6), Assault Resulting in Serious Bodily Injury, were committed by BEGAY and WILSON, and that evidence of such violations will be found on the person of Wallace BEGAY, date of birth: XX/XX/1956, SSN XXX-XX-4097 and Renado WILSON, date of birth: XX/XX/2004, SSN XXX-XX-7579. Latent fingerprint analysis is relevant and material to forensically evaluate BEGAY and WILSON's potential participation in the assault of JOHN DOE.

21. I respectfully request a search warrant be issued to search the person of Wallace BEGAY, date of birth: XX/XX/1956, SSN XXX-XX-4097 and Renado WILSON, date of birth: XX/XX/2004, SSN XXX-XX-7579, for the purpose of obtaining fingerprints and palm prints according to the standard practices and procedures employed by the FBI for fingerprint comparison.

22. Supervisory Assistant United States Attorney Elisa Dimas reviewed and approved this affidavit for legal sufficiency to establish probable cause.



Respectfully submitted,



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**Alyson Berry**  
Special Agent  
Federal Bureau of Investigations

August 23, 2023

Subscribed and sworn telephonically and signed electronically on \_\_\_\_\_, 2023



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HONORABLE B. PAUL BRIONES  
UNITED STATES MAGISTRATE JUDGE

REFERENCE PHOTOGRAPHS



Photograph 1



Photograph 2



Photograph 3

ATTACHMENT A

1. The person of Renado WILSON, date of birth: XX/XX/2004, SSN XXX-XX-7579, a Native American male.

ATTACHMENT B

Property to be Seized

From Renado WILSON, date of birth: XX/XX/2004, SSN XXX-XX-7579:

1. Fingerprints according to the standard practices and procedures employed by the FBI.